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Attorneys for Defendant
LEFRAK ORGANIZATION, INC.

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARLOS A. VALENCIA and GLORIA N. BONILLA,

Plaintiffs,

-against-

100 CHURCH, LLC, AMBIENT GROUP, INC.,
BANKERS TRUST COMPANY, BATTERY PARK
CITY AUTHORITY, BT PRIVATE CLIENTS CORP.,
CUNNINGHAM DUCT CLEANING CO., INC.,
DEUTSCHE BANK TRUST COMPANY,
DEUTSCHE BANK TRUST COMPANY
AMERICAS, DEUTSCHE BANK TRUST
CORPORATION, EMPIRE STATE PROPERTIES,
INC., GPS ENVIRONMENTAL CONSULTANTS,
INC., HUDSON TOWERS HOUSING CO., INC.,
INDOOR AIR PROFESSIONALS, INC., INDOOR
ENVIRONMENTAL TECHNOLOGY, INC., LAW
ENGINEERING P.C., LEFRAK ORGANIZATION,
INC., MERRILL LYNCH & CO, INC., ONE WALL
STREET HOLDINGS, LLC., ROYAL AND
SUNALLIANCE INSURANCE GROUP, PLC, THE
BANK OF NEW YORK COMPANY, INC., THE
BANK OF NEW YORK TRUST COMPANY NA,
TISHMAN INTERIORS CORPORATION, TRC
ENGINEERS, INC., and ZAR REALTY
MANAGEMENT CORP.,

Defendants.

Case No.:
07-CV-5324 (AKH)

**NOTICE OF ADOPTION
OF ANSWER TO MASTER
COMPLAINT OF LEFRAK
ORGANIZATION, INC.**

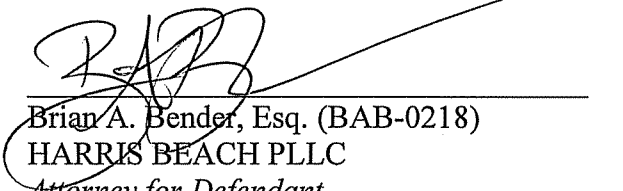
PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
September 10, 2007

Yours etc.,

HARRIS BEACH PLLC



Brian A. Bender, Esq. (BAB-0218)

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Attorney for Defendant

LEFRAK ORGANIZATION, INC.

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